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AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA

June 5, 1998

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THOMAS V. MCKERNAN, JR.
President and
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(714) 885-1222

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JUN 19 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Susan Ness
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: AAA Petition for Reconsideration
PR Docket No. 92-235

Dear Commissioner Ness:

On behalf of the Automobile Club of Southern California, I urge you to grant the American Automobile Association's (AAA) petition for reconsideration. We and the AAA are concerned about FCC's February 20, 1997, order which placed the Automobile Emergency Radio Services (AERS) frequencies in the new Industrial/Business pool rather than grant them quasi-public safety status.

Granting the request for quasi-public safety status would return to the AAA coordination rights to auto emergency frequencies. This is similar to the protection granted railroads, petroleum companies, and utilities. Coordinators cannot deny use of frequencies to applicants but could ensure that assignments do not cause interference with emergency uses.

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The following information may be of assistance as you evaluate the merits of AAA's request:

The Automobile Club of Southern California (the Club) is the largest AAA affiliate in the country. We are a non-stock, not-for-profit California corporation with over 4.5 million members in Southern California. To help put this in context, we have members in over 40% of the households in this area. One of the primary services that we and all AAA clubs offer to members is emergency roadside assistance.

Last year, the Club responded to over 4.3 million member calls for emergency road service. Eight percent or nearly 340,000 calls, came directly from public agencies such as the California Highway Patrol, the California Department of Transportation, and local police and sheriffs departments. All of these calls involve either accidents or mechanical breakdown on freeways, highways, or remote roads. A public agency call receives automatic priority, and it is imperative that our dispatchers send assistance to the stranded motorist as quickly as possible.

Generally, public agency calls originate either from call boxes or cellular telephones. Although actual numbers are not available, a number of the CHP offices that we work with attempted to estimate the number of such calls received from Club members. Some responses include: 60 – 70% from San Luis Obispo County, 45% from Ventura County, 40 – 45% in Bakersfield County, and 30 – 50% in San Diego County. Los Angeles did not have up-to-date figures, but staff in the past has provided unofficial estimates of 40 – 50%.

We also respond to nearly 27,000 "hot calls" each year. These involve situations of particular urgency, such as a member fearful for his or her personal safety or, surprisingly common, a frantic parent who has locked a baby in the car. It also covers any vehicle on the freeway that is blocking traffic. We, rather than the police, are often the first choice for assistance, in recognition, perhaps of the limited resources of many police agencies. Our dispatchers and contractors literally drop everything to expedite services to members in these situations. Any delay in transmitting the information between the Club and the service station poses increased risk to our members.

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The Club works closely with state and local law enforcement and safety agencies in our service area. For example, we are currently working on a project proposed by the Los Angeles Service Authority for Freeway Emergencies (SAFE), the agency that oversees the callbox program in Los Angeles County. Because of the high volume of member calls and our proven ability to respond quickly to those calls, SAFE has proposed adding a button to the callboxes to allow members to access the Club directly, without going through the CHP. We believe that this will not only relieve pressure on the agencies, but will allow us to provide better faster service to members. It would be ironic if the timesaving gained by this improved process were lost due to radio interference and delay in dispatching the rescue vehicle.

Thank you for your thoughtful consideration of this issue. We would be glad to provide any other information necessary to assist your review.

Sincerely,


Thomas V. McKernan